



TO: THE HONORABLE CHIEF JUDGE MICHAEL B. KAPLAN UNITED STATES  
BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

BlockFi Inc. and its debtor affiliates (the “Wind-Down Debtors,” previously the “Debtors”), by and through their undersigned counsel, request that the time period to notice a hearing on the *Motion to Redact and File Certain Information Under Seal* (“Motion to Seal”) in connection with the simultaneously filed *Wind-Down Debtors’ Motion for an Order (I) Authorizing and Approving the Settlement and Release of Claims and Causes of Action By and Among the Wind-Down Debtors and 3AC and (II) Granting Related Relief* (the “9019 Motion”), as required by FED. R. BANKR. P. 2002 be shortened pursuant to FED. R. BANKR. P. 9006(c)(1), for the reason(s) set forth below:

1. Contemporaneously herewith, the Wind-Down Debtors filed the Motion to Seal and the 9019 Motion. The Motion to Seal seeks a protective order in relation to the 9019 Motion which seeks approval of the settlement between the Wind-Down Debtors and 3AC.

2. The Wind-Down Debtors respectfully request that the Court enter the proposed order scheduling a hearing on the Motion to Seal and the 9019 Motion on **February 6, 2024, at 10:00 a.m. ET**. Shortened notice is required because delaying approval of the 9019 Motion will impact the Debtors’ ability to make distributions out of Lending LLC; and

3. A shortened notice period will not prejudice any parties and is not prohibited under FED. R. BANKR. P. 9006(c)(1).

**WHEREFORE**, the Debtors respectfully request entry of the Order shortening the notice period for the Motion to Quash, and for such other and further relief as the Court may deem just and appropriate.

Respectfully Submitted,

Dated: January 18, 2024

/s/ Donald W. Clarke

**GENOVA BURNS LLC**

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